

MEMO ENDORSED

August 8, 2025

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VIA ECF

The Honorable Andrew L. Carter, Jr.
United States Courthouse
40 Foley Square
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED: 08/13/2025

Re: *Hedgeye Risk Management, LLC v. Dale, et al.*, No. 1:21-cv-3687 (ALC) (RWL)

Dear Judge Carter:

We represent plaintiff Hedgeye Risk Management, LLC (“Hedgeye”) in the above captioned matter. We write to request that Hedgeye’s Letter Motion filed with the Court on August 8, 2025 (“Hedgeye’s Letter Motion”) be filed unredacted under seal, and redacted on the public docket as it contains examples of content that is designated by Hedgeye as Attorneys Eyes Only (“AEO”). The redacted portions describe key parts of the parties’ arguments on whether Hedgeye’s model is a trade secret. These references are currently filed under seal pending resolution of various sealing determinations before Magistrate Judge Lehrburger. *See* Dkt. Nos. 960, 960-1, 961 & 961-1.

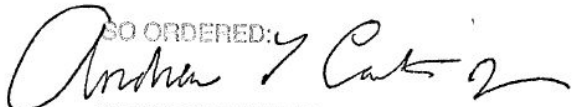
For the Court’s convenience, and consistent with Hedgeye’s Summary Judgment and Motion *in limine* briefings, Hedgeye has marked the proposed redactions in Hedgeye’s Letter Motion in red highlighting to signify Hedgeye’s designation of this material as AEO.

Respectfully submitted,

/s/ Jessie F. Beeber

Jessie F. Beeber

cc: All counsel via ECF

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE
August 13, 2025
New York, NY